

1 Q. What design work did you do for the KP-15?

2 A. In conjunction with Russell, we created the
3 overall look, feel and features of the part, which was
4 what I would consider to be the design, the -- you know,
5 if you look at an architect saying this is what I want my
6 house to look, that's how the how is going to look. If
7 you look at every stud or everything in the house, that
8 wouldn't necessarily be something that they would do. A
9 draftsman would do it.

10 So, as far as look and feel of what we
11 wanted it to be.

12 Q. Okay. Let's parse this out. What design work,
13 aside from Russell, did you do for the KP-15?

14 A. Like I said, they would -- we would sit down and
15 discuss, "This is what we want this thing to look like."
16 Jovan would go and do some preliminary drawings and
17 sketches. We say "Move this here. Change this here. We
18 want to keep this form."

19 Our billet lower receiver's a pretty popular
20 design so we wanted to make sure that all of those forms
21 and features stay true to the part.

22 Q. So, you just -- your design work was describing
23 to Mr. Beltran what you wanted the part to look like?

24 A. Correct.

25 Q. And what did you tell him you wanted it to look

1 yeah.

2 BY MR. BOGAN:

3 Q. When you designed the KP-15 did you use Russell

4 Phagan's know-how?

5 MR. CALAWAY: Object to the form.

6 THE WITNESS: He was part of the design

7 team. I'm sure he --

8 BY MR. BOGAN:

9 Q. So, yes, you did?

10 A. His knowledge was part of it, yes.

11 Q. If you will turn to Exhibit 150 in that book for
12 me, please. Do you know what that is?

13 A. Looks like a lower cut.

14 Q. Do you know what kind of lower it is?

15 A. From the picture, I can't specifically tell you.

16 Q. Is that a KP-15 lower?

17 A. It resembles one.

18 MR. BOGAN: Okay. Let's take a short break.

19 I think I'm just about finished.

20 MR. CALAWAY: Okay.

21 MR. BOGAN: We can go off the record.

22 (Recess taken from 2:35 p.m. to 2:41 p.m.)

23 BY MR. BOGAN:

24 Q. All right. We will go back on. We are back on
25 the record after a short break.